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E-FILED - 4/25/07

16
17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN JOSE DIVISION

20 In re CONSECO INSURANCE CO. } No. C-05-04726-RMW
20 ANNUITY MARKETING & SALES }
20 PRACTICES LITIG. }
21
21 This Document Relates To: }
22 ALL ACTIONS. }
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22 STIPULATION AND [PROPOSED] ORDER
22 TO EXTEND TIME TO FILE SECOND
23 AMENDED CONSOLIDATED CLASS
23 ACTION COMPLAINT

1 The Parties hereto, through their respective attorneys of record, stipulate and request the
2 Court to enter an order setting the following schedule concerning the filing of Plaintiffs' Second
3 Amended Consolidated Class Action Complaint:

4 Plaintiffs' Second Amended Consolidated Class Action Complaint due: April 16, 2007; and
5 Defendant's Motion to Dismiss Plaintiffs' Second Amended Complaint due: May 31, 2007.

6 The parties have conferred and agree that good cause exists for the extension of time.

7 DATED: April 10, 2007

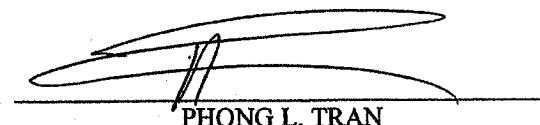
BARRACK, RODOS & BACINE



STEPHEN R. BASSER
Co-Lead Counsel for Plaintiffs

11 DATED: April 10, 2007

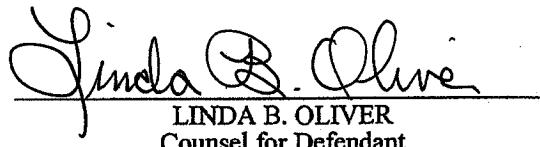
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PHONG L. TRAN
Co-Lead Counsel for Plaintiffs

15 DATED: April 10, 2007

REED SMITH LLP



LINDA B. OLIVER
Counsel for Defendant

20 * * *

21 ORDER

22 The Case Management Conference Order is adjusted in accordance with the above
23 stipulation. IT IS SO ORDERED.

24 DATED: 4/25/07



THE HONORABLE RONALD M. WHYTE
UNITED STATES DISTRICT JUDGE

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CERTIFICATE OF SERVICE

I hereby certify that on April 10, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

7 I certify under penalty of perjury under the laws of the United States of America that the
8 foregoing is true and correct. Executed on April 10, 2007.

s/ PHONG L. TRAN

PHONG L. TRAN

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